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SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

IAN BENJAMIN ROGERS, and
JARROD COPELAND

Defendants.

) Case No. 3:21-cr-00274 CRB

)
) MOTION TO SEAL DOCUMENTS AND DOCKET
) AND TO DELAY MERGING THE COMPLAINT
) UNTIL SUCH TIME AS THE INDICTMENT IS
) UNSEALED

FILE UNDER SEAL

The United States, by and through its counsel, Assistant United States Attorney Frank Riebli, moves this Court for an order sealing the government's application for a sealing order, the sealing order, the indictment and arrest warrant, and all attachments in the above-referenced case. Disclosure of the specified documents might jeopardize the government's ability to seize a specific item of evidence and the defendant's arrest. Specifically, the government anticipates seeking an arrest warrant for defendant Jarrod COPELAND, and a warrant to seize a specific item of evidence that law enforcement previously saw at COPELAND's residence, and photographed but did not seize. At the time, law enforcement did not appreciate the item's significance. The government will seek a seizure warrant and will attempt to seize that item when it executes the arrest warrant. If COPELAND learns of the indictment before law

1 enforcement have a chance to execute the warrants, he may dispose of the evidence.

2 It is for this same reason that the government asks the Court to seal the record of this indictment
3 temporarily and direct the Clerk of the Court to delay merging the complaint into the indictment.
4 COPELAND's co-defendant, Ian ROGERS, has already been arrested on a federal charge and has
5 appeared in that action with counsel. His counsel will be notified of any changes to the docket –
6 including the automatic notification generated with the Clerk of the Court merges the complaint into the
7 indictment – and will have the opportunity (and obligation) to notify ROGERS. This, in turn, will result
8 in notification reaching COPELAND. ROGERS is scheduled to appear before a federal magistrate on
9 July 30, 2021. The government anticipates arresting COPELAND and unsealing the indictment and
10 docket before that appearance. Thus, the government seeks only a temporary sealing – about three
11 weeks – to ensure the safe arrest of COPELAND and possible seizure of an item of evidence.

12 Accordingly, the United States requests that the Court seals these documents, except that the
13 Clerk of Court shall provide copies of the sealed documents to employees of the United States
14 Attorney's Office. The United States further requests that the United States Attorney's Office be
15 permitted to share these documents as necessary to comply with its discovery obligations, and with the
16 Federal Bureau of Investigation.

17 DATED: July 6, 2021

Respectfully submitted,

18 STEPHANIE M. HINDS
19 Acting United States Attorney

20 */s/ Frank J. Riebli*
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